

AO 91 (Rev 8/01) Criminal Complaint

MAR 25 2019

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

David J. Bradley, Clerk

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Cesar Salvador Sandoval

PRINCIPAL

Case Number:

YOB:

1982

M-19-0675-M

United States

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about March 21, 2019 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact Cornelio Mejia-Mondragon, a citizen of Mexico, and Roger Gustavo Raudales-Banegas, a citizen, along with four (4) other undocumented aliens, for a total of six (6), who had entered the United States in violation of law, did knowingly transport, or move or attempted to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Cuevitas, Texas to the point of arrest near Sullivan City, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On March 21, 2019, the Department of Public Transportation (DPS) conducted a vehicle stop and requested assistance from Border Patrol. Agents responded and made contact with a DPS Trooper.

The DPS Trooper informed agents he conducted a vehicle stop on a red Chevrolet Silverado for running a stop sign. After approaching the pick up truck, the Trooper explained he discovered six subjects laying down in the bed of the truck, some on top of each other. The Trooper also identified the driver as Cesar Salvador Sandoval Jr.

I declare under penalty of perjury that the statements in this complaint are true and correct. Executed on March 23, 2019.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Submitted by reliable electronic means, sworn to and attested to telephonically per Fed. R. Cr. P. 4.1, and probable cause found on:

/s/ Julio C. Peña

Signature of Complainant

Julio C. Peña

Senior Patrol Agent

Printed Name of Complainant

March 23, 2019

12:25 p.m.

Date

at McAllen, Texas

City and State

Peter E. Ormsby

U. S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-19-0675-M

RE: Cesar Salvador Sandoval

CONTINUATION:

Agents conducted an immigration inspection and determined the six subjects in the bed of the pickup truck were all undocumented aliens. Cesar Salvador Sandoval was determined to be a United States Citizen.

All the subjects were transported to the Rio Grande City Border Patrol Station for processing.

Principal Statement

Cesar Salvador Sandoval Jr. was read his Miranda Rights. He understood his rights and provided a sworn statement.

Sandoval stated a relative offered him the job and he accepted. Sandoval needed to pick up the undocumented aliens and he would receive \$60 for each person. After picking up the people, Sandoval was transporting them to his relative's house.

Material Witnesses

Cornelio Mejia-Mondragon and Roger Raudales-Banegas were read their Miranda Rights. Both understood their rights and each provided a sworn statement.

Mejia, a citizen of Mexico, stated his brother made the smuggling arrangements for \$6,000 USD. According to Mejia, he crossed into the United States on a raft with two other people. Before crossing, Mejia was described landmarks and given directions on where to go. According to Mejia, they were sent without a foot guide. While making their way, they encountered and joined together with three other subjects in the brush. Mejia claimed he was also being guided over the phone. Mejia was told that a red pickup truck was going to pick them up. Mejia then waited until the truck showed up and they all boarded.

Mejia identified Sandoval, through a photo lineup, as the driver of the pickup truck.

Raudales, a citizen of Honduras, stated he crossed into the United States on a raft with two other persons. Raudales claimed they used a white blimp in the sky as a guide. Raudales was also given directions and the rafter told them a red pickup truck would be picking them up. According to Raudales, they were hiding when they encountered three more persons. Raudales was told by someone in the group to come out because the truck arrived. Raudales remembers that the driver told them to get on fast and board in the back of the truck bed.

Raudales identified Sandoval, through a photo lineup, as the driver of the pickup truck.